

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	
High-Cost Universal Service Support	WC Docket No. 05-337
Federal-State Joint Board on Universal Service	CC Docket No. 96-45
Lifeline and Link Up	WC Docket No. 03-109
Universal Service Contribution Methodology	WC Docket No. 06-122
Notice of Proposed Rulemaking	CC Docket No. 08-262
Implementation of the Local Competition Provisions in the Telecommunications Act of 1996	CC Docket No. 96-98
Developing a Unified Inter-carrier Compensation Regime	CC Docket No. 01-92
Inter-carrier Compensation for ISP-Bound Traffic	CC Docket No. 99-68
IP-Enabled Services	WC Docket No. 04-36

COMMENTS OF
THE TOLEDO TELEPHONE CO, INC.

November 26, 2008

SUMMARY

The Toledo Telephone Co., Inc. very much appreciates the opportunity to comment in response to the Further Notice of Proposed Rulemaking (“FNPRM”)¹ issued November 5, 2008, under FCC 08-262.

In these Comments, The Toledo Telephone Co., Inc. would like to point out that the reforms that are set out on Plan A and Plan B not only will make access to capital for investment in rural infrastructure impossible to obtain, but threaten the very ability of rural telephone companies to survive. And therefore propose an even greater threat towards those consumers who live in rural areas served by companies similar to ours. Without question, the proposals contained as a whole in Plans A and B should not be adopted.

The Toledo Telephone Co, Inc. would also note that there are common elements of the proposals set forth in The Alternative Proposal Plan C, and NTCA’s ex parte filed November 18th 2008 that represent positive steps towards reform of universal service and addressing intercarrier compensation issues. Chief among these are: (1) inclusion of rate of return recovery mechanisms; (2) elimination of the identical support rule; (3) creation of traffic record rules to address phantom traffic issues; (4) adoption of a rural transport rule; and (5) all rural customers have a right to affordable, dependable basic telephone and broadband services.

¹ For purposes of these Comments, the proposal set out in Appendix A of the FNPRM, which is identified in the FNPRM as the Chairman’s Draft Proposal circulated on October 15, 2008, will be referred to as Plan A. The proposal set out in Appendix B, which is identified as a Narrow Universal Service Reform Proposal circulated on October 31, 2008, will be identified as Plan B. The proposal set out in Appendix C to the FNPRM is identified as a draft Alternative Proposal circulated by the Chairman on November 5, 2008. That proposal will be referred to in these Comments as Plan C.

We applaud the efforts of OPASCTO and WTA to negotiate on our behalf however, we believe NTCA has presented the Commission with a clear and concise assessment that best addresses our concerns, and also ensures high quality telephone and broadband service is available rural America.

The Toledo Telephone Co, Inc. believes this FNPRM has the core elements that could address intercarrier compensation and universal service reform that would prevent future fraud, waste, and abuse while sustaining and even enhancing broadband access for all Americans.

Thank you for the opportunity to comment.

Respectfully submitted this 26th day of November, 2008.

By: 

Russell Ramsey
Vice President
The Toledo Telephone Co, Inc.